

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

-----X	:	
In re	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
	:	
-----X	X	

**STIPULATION FOR ENTRY OF AN ORDER CONCERNING DEADLINE
FOR DEPOSITION OF OBJECTING CREDITORS' EXPERT WITNESS**

NOW COMES the City of Detroit, Michigan; and Assured Guaranty Municipal Corp. and National Public Finance Guarantee Corporation (collectively, “Objecting Creditors”), by and through the undersigned counsel, and hereby stipulate to entry of an Order Concerning Deadline For Deposition Of Objecting Creditors’ Expert Witness in the form of Exhibit 1 hereto.

Whereas, the Court entered the Sixth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor’s Plan of Adjustment (ECF # 6376) (the “Sixth Amended Scheduling Order”) on July 29, 2014. The Sixth Amended Scheduling Order establishes August 11, 2014 for the deadline to complete all depositions of experts and non-experts.

Whereas, on August 1, 2014, the City filed that certain Notice of Video Deposition of Nathaniel Singer.

Whereas, on August 4, 2014, the Objecting Creditors indicated Mr. Singer was unavailable on that date, the parties worked cooperatively to reach a resolution that both accommodated Mr. Singer's schedule while at the same time preserving the City's opportunity to promptly depose Mr. Singer, and the parties agreed as follows:

1. The deposition of Mr. Singer will take place on August 12, 2014.
2. All other deadlines in the Sixth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor's Plan of Adjustment (6376) shall remain the same.

Wherefore, the parties stipulate to, and respectfully request entry of, the order attached hereto as Exhibit 1.

Dated: August 6, 2014

/s/ Deborah Kovsky-Apap
Deborah Kovsky-Apap (P68258)
Robert S. Hertzberg (P30261)
PEPPER HAMILTON LLP
4000 Town Center, Suite 1800
Southfield, MI 48075
(248) 359-7300 - Telephone
(248) 359-7700 - Fax
hertzbergr@pepperlaw.com
kovskyd@pepperlaw.com

and

Thomas F. Cullen, Jr. (DC 224733)
Gregory M. Shumaker (DC 416537)
Geoffrey S. Stewart (DC 287979)
JONES DAY

51 Louisiana Ave., N.W.
Washington, D.C. 20001
Telephone: (202) 879-3939
Facsimile: (202) 626-1700
tfcullen@jonesday.com
gshumaker@jonesday.com
gstewart@jonesday.com

Attorneys for the City of Detroit,
Michigan

/s/ Guy S. Neal
SIDLEY AUSTIN LLP
Guy S. Neal
1501 K Street, N.W.
Washington, DC 20005
Tel: (202) 736-8000
Fax: (202) 736-8711
Email: gneal@sidley.com

Attorneys for National Public Finance
Guarantee Corporation

/s/ Robin D. Ball
CHADBOURNE & PARKE LLP
Robin D. Ball
350 South Grand Avenue
32nd Floor
Los Angeles, CA 90071
Tel: (213) 892-2025
Email: RBall@chadbourne.com

Attorneys for Assured Guaranty
Municipal Corp.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing stipulation was filed and served via the Court's electronic case filing and noticing system on this 6th day of August, 2014.

/s/ Deborah Kovsky-Apap
Deborah Kovsky-Apap (P68258)

EXHIBIT 1

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

-----X	:	
In re	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
	:	
-----X		

**ORDER CONCERNING DEADLINE FOR
DEPOSITION OF OBJECTING CREDITORS' EXPERT WITNESS**

This matter having come to the Court upon the stipulation of the City of Detroit, Michigan, on the one hand, and Assured Guaranty Municipal Corp. and National Public Finance Guarantee Corporation, on the other; and the Court being otherwise duly advised in the premises;

NOW, THEREFORE, IT IS ORDERED

The deposition of Nathaniel Singer will take place on August 12, 2014.

This Order pertains solely to the deposition of Mr. Singer. All other deadlines in the Sixth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor's Plan of Adjustment (ECF # 6376) shall remain the same.